

MCDERMOTT WILL & SCHULTE LLP

Charles R. Gibbs (TX Bar No. 7846300)
Marcus A. Helt (TX Bar No. 24052187)
Grayson Williams (TX Bar No. 24124561)
Michael Wombacher (TX Bar No. 24120434)
2801 North Harwood Street, Suite 2600
Dallas, Texas 75201
Telephone: (214) 295-8000
E-mail: crgibbs@mwe.com
mhelt@mwe.com
gwilliams@mwe.com
mwombacher@mwe.com

MCDERMOTT WILL & SCHULTE LLP

Darren Azman (admitted *pro hac vice*)
One Vanderbilt Avenue
New York, New York 10017-3852
Telephone: (212) 547-5400
E-mail: dazman@mwe.com

Proposed Counsel to the Chapter 7 Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

_____	)	
In re:	)	Chapter 7
	)	
TRICOLOR HOLDINGS, LLC, <i>et al.</i> , ¹	)	Case No. 25-33487 (MVL)
	)	
Debtors.	)	
_____	)	

**WITNESS AND EXHIBIT LIST OF THE CHAPTER 7 TRUSTEE
FOR HEARING SCHEDULED ON OCTOBER 15, 2025**

Anne Elizabeth Burns, solely in her capacity as the duly appointed Chapter 7 bankruptcy trustee (the “Trustee”) for Tricolor Holdings, LLC and its various debtor affiliates (collectively, the “Debtors”), hereby files this *Witness and Exhibit List of the Chapter 7 Trustee for Hearing*

¹ The Debtors in these chapter 7 cases are as follows: Tricolor Holdings, LLC, TAG Intermediate Holding Company, LLC, Tricolor Auto Group, LLC, Tricolor Auto Acceptance, LLC, Tricolor Insurance Agency, LLC, Tricolor Home Loans LLC dba Tricolor Mortgage, Tricolor Real Estate Services, LLC, TAG California Holding Company, LLC, Flexi Compras Autos, LLC, TAG California Intermediate Holding Company, LLC, Tricolor California Auto Group, LLC, Tricolor California Auto Acceptance, LLC, Risk Analytics LLC, Tricolor Tax, LLC, Tricolor Financial, LLC, Tricolor Auto Receivables LLC, TAG Asset Funding, LLC, and Apoyo Financial, LLC.



Scheduled on October 15, 2025 (the “Witness and Exhibit List”) in connection with the matters scheduled for hearing on October 15, 2025, at 9:30 a.m. (prevailing Central Time) (the “Hearing”):

WITNESSES

1. Anne Elizabeth Burns, Chapter 7 Trustee;
2. Any witness listed, offered, or called by any other party;
3. Any witness necessary to authenticate a document; and
4. Any witness required for rebuttal or impeachment.

EXHIBITS

Exhibit No.	Description	Offered	Objection	Admitted	Disposition After Hearing
1.	Any pleading on file in these cases				
2.	Any exhibits listed, designated, or offered by any other party				
3.	Any exhibits necessary for rebuttal				

RESERVATION OF RIGHTS

The Trustee reserves the right to amend or supplement this Witness and Exhibit List at any time prior to the Hearing and/or in compliance with the Local Bankruptcy Rules and the Orders of this Court. The Trustee reserves the right to offer into evidence any other exhibit designated by any other party in connection with the hearing on these matters. The Trustee also reserves the right to offer into evidence such additional testimony and documents as may be appropriate for rebuttal or impeachment purposes.

Dated: Dallas, Texas
October 14, 2025

MCDERMOTT WILL & SCHULTE LLP

/s/ Charles R. Gibbs

Charles R. Gibbs (TX Bar No. 7846300)
Marcus A. Helt (TX Bar No. 24052187)
Grayson Williams (TX Bar No. 24124561)
Michael Wombacher (TX Bar No. 24120434)
2801 North Harwood Street, Suite 2600
Dallas, Texas 75201-1664
Tel: (214) 295-8000
Fax: (972) 232-3098
E-mail: crgibbs@mwe.com
mhelt@mwe.com
gwilliams@mwe.com
mwombacher@mwe.com

-and-

Darren Azman (admitted *pro hac vice*)
One Vanderbilt Avenue
New York, New York 10017-3852
Tel: (212) 547-5400
Fax: (212) 547-5444
E-mail: dazman@mwe.com

Proposed Counsel to the Chapter 7 Trustee

CERTIFICATE OF SERVICE

I do hereby certify that on October 14, 2025, a true and correct copy of the foregoing document was served via CM/ECF for the United States Bankruptcy Court for the Northern District of Texas on all parties authorized to receive electronic notice in this case.

/s/ Charles R. Gibbs
Charles R. Gibbs